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8 IN THE UNITED STATES DISTRICT COURT

9 EASTERN DISTRICT OF CALIFORNIA

10

11 UNITED STATES OF AMERICA,

1:22-MC-00035-JLT

12 Plaintiff,

13 v.

14 CONSENT JUDGMENT OF FORFEITURE

15 APPROXIMATELY \$25,000.00 IN U.S.
CURRENCY,

16 Defendant.

17 Pursuant to the Stipulation for Consent Judgment of Forfeiture, the Court finds:

18 1. On September 2, 2021, agents with the Federal Bureau of Investigation (“FBI”) seized
19 the approximately \$25,000.00 in U.S. Currency (“defendant currency”), during execution of a state
20 search warrant at 3770 Buenaventura Drive, in Ceres, California.

21 2. FBI commenced administrative forfeiture proceedings, sending direct written notice to
22 all known potential claimants and publishing notice to all others. On December 1, 2021, the FBI
23 received a claim from Jesus Pedro Maldonado Ceja (“Claimant” or “Maldonado Ceja”) asserting an
24 ownership interest in the defendant currency.

25 3. The United States represents that it could show at a forfeiture trial that since July 2021,
26 law enforcement received intelligence that the social media Instagram page “BossFarmz” was
27 connected to a marijuana grow operation located on California Highway 88 in Stockton, California.
28 Law enforcement searched the Highway 88 location and found many marijuana plants growing in

1 covered greenhouses on the property. The search also resulted in the identification of ten additional
2 grow locations complete with greenhouse structures, grow fields, and marijuana plants.

3 4. The United States represents that it could further show at a forfeiture trial that law
4 enforcement launched surveillance on the ten illegal grow locations and observed five vehicles that
5 frequented the sites, including a 2008 Toyota Avalon. One of the identified vehicles, a Ford pickup
6 truck, was registered to one of the suspects operating the grow sites. Surveillance also identified a 2021
7 Toyota Tacoma driven by an individual associated with the “BossFarmz” Instagram page. Law
8 enforcement received prior anonymous citizen tips stating this individual is known to operate multiple
9 marijuana grow locations in Stockton and Modesto, California. Although the 2021 Toyota Tacoma is
10 registered to an address on Oak Street in Stockton, California, surveillance frequently saw the 2021
11 Toyota Tacoma parked at the Buenaventura Street address.

12 5. The United States represents that it could show at a forfeiture trial that surveillance on
13 the Ford and Toyota revealed regular stops at locations on Wolfinger Road and Lower Jones Road in
14 Stockton, California. At the Wolfinger Road location, law enforcement observed marijuana plants
15 growing inside a clear plastic covered greenhouse. At the Lower Jones Road location, surveillance
16 observed 1,000 marijuana plants growing within the cornfields on the property.

17 6. The United States represents that it could also show that surveillance observed the Ford
18 stop at an agricultural location on Roberts Road in Stockton, California. At this location, law
19 enforcement observed at least 20 acres of hemp plants and suspect the hemp grow is featured on
20 “BossFarmz’s” social media.

21 7. The United States represents that it could show further investigation identified two
22 brothers of the target individual as involved in the marijuana operations, one of whom was identified as
23 residing on Buenaventura Drive in Ceres, California. Surveillance has observed a 2015 Chevrolet
24 Truck registered to Maldonado Ceja parked at the Buenaventura Drive address.

25 8. The United States can show at a trial that on or about August 17, 2021, law enforcement
26 reviewed DMV records for Maldonado Ceja, which showed that on February 13, 2021, Maldonado
27 Ceja was cited while driving a 2008 Toyota Avalon. Law enforcement recognized the 2008 Toyota
28 Avalon as a vehicle frequenting the Highway 88 marijuana grow site.

1 9. The United States can show at a forfeiture trial that on September 1, 2021, law
2 enforcement searched the Wolfinger location and arrested several individuals, including Maldonado
3 Ceja. Maldonado Ceja was charged in Stockton County Superior Court with violations of cultivating
4 marijuana and possession of marijuana for sale, *People v. Jesus Pedro Maldonado Ceja*, Case No.
5 2022-0004022, which is still pending.

6 10. The United States can also show at a trial that on September 2, 2021, law enforcement
7 searched the Buenaventura Street address and found \$150,832.00 in U.S. Currency, bail bonds
8 paperwork for Maldonado Ceja (for his arrest at the Wolfinger Road the day prior), and a package sent
9 from Plainview, Texas containing cash. The 2016 Toyota Tacoma previously seen a various marijuana
10 grow locations during the investigation was parked at the residence during the September 2nd search.

11 11. The United States can show that the approximately \$150,832.00 in U.S. Currency was
12 found throughout the Buenaventura residence: \$24,000.00 in a vacuum-sealed bag in the master
13 bedroom closet; \$29,900.00 in the master bedroom closet in a black jacket; \$29,000.00 in a plastic
14 storage container in the master bedroom closet; \$9,100.00 in the master bedroom closet in a shoe;
15 \$28,500.00 in a pair of Ugg boots in the master bedroom; \$30,000.00 in a cowboy boot in a secondary
16 bedroom; and smaller denominations in bathrooms and other areas throughout the house.

17 12. The United States could further show at a forfeiture trial that the defendant currency is
18 forfeitable to the United States pursuant to 21 U.S.C. § 881(a)(6).

19 13. Without admitting the truth of the factual assertions contained above, Claimant
20 specifically denying the same, and for the purpose of reaching an amicable resolution and compromise
21 of this matter, Claimant agrees that an adequate factual basis exists to support forfeiture of the
22 defendant currency. Jesus Pedro Maldonado Ceja acknowledged that he is the sole owner of the
23 defendant currency, and that no other person or entity has any legitimate claim of interest therein.
24 Should any person or entity institute any kind of claim or action against the government with regard to
25 its forfeiture of the defendant currency, Claimant shall hold harmless and indemnify the United States,
26 as set forth below.

27 14. This Court has jurisdiction in this matter pursuant to 28 U.S.C. §§ 1345 and 1355, as this
28 is the judicial district in which acts or omissions giving rise to the forfeiture occurred.

1 15. This Court has venue pursuant to 28 U.S.C. § 1395, as this is the judicial district in
2 which the defendant currency was seized.

3 16. The parties herein desire to settle this matter pursuant to the terms of a duly executed
4 Stipulation for Consent Judgment of Forfeiture.

5 Based upon the above findings, and the files and records of the Court, it is hereby ORDERED
6 AND ADJUDGED:

7 1. The Court adopts the Stipulation for Consent Judgment of Forfeiture entered into by and
8 between the parties.

9 2. Upon entry of this Consent Judgment of Forfeiture, \$20,000.00 of the defendant
10 Approximately \$25,000.00 in U.S. Currency, together with any interest that may have accrued on the
11 total amount seized, shall be forfeited to the United States pursuant to 21 U.S.C. § 881(a)(6), to be
12 disposed of according to law.

13 3. Upon entry of this Consent Judgment of Forfeiture, but no later than 60 days thereafter,
14 \$5,000.00 of the defendant Approximately \$25,000.00 in U.S. Currency shall be returned to claimant
15 Jesus Pedro Maldonado Ceja through his attorney Robert Forkner.

16 4. The United States of America and its servants, agents, and employees and all other
17 public entities, their servants, agents and employees, are released from any and all liability arising out
18 of or in any way connected with the seizure or forfeiture of the defendant currency. This is a full and
19 final release applying to all unknown and unanticipated injuries, and/or damages arising out of said
20 seizure or forfeiture, as well as to those now known or disclosed. Claimant waived the provisions of
21 California Civil Code § 1542.

22 5. No portion of the stipulated settlement, including statements or admissions made
23 therein, shall be admissible in any criminal action pursuant to Rules 408 and 410(a)(4) of the Federal
24 Rules of Evidence.

25 6. All parties will bear their own costs and attorney's fees.

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1 7. Pursuant to the Stipulation for Consent Judgment of Forfeiture filed herein, the Court
2 enters a Certificate of Reasonable Cause pursuant to 28 U.S.C. § 2465, that there was reasonable cause
3 for the seizure of the above-described defendant currency.

4 IT IS SO ORDERED.
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6 Dated: April 28, 2023

Jennifer L. Thurston
7 UNITED STATES DISTRICT JUDGE
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